

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Lordstown Motors Corp., *et al.*,¹

Debtor.

Chapter 11

Case No. 23-10831 (MFW)
(Jointly Administered)

**CERTIFICATION OF COUNSEL REGARDING
STIPULATION BETWEEN DEBTORS AND FIBERDYNE RESEARCH PTY
LTD REGARDING TEMPORARY ALLOWANCE OF CLAIMS SOLELY FOR
PURPOSES OF VOTING ON DEBTORS' JOINT CHAPTER 11 PLAN**

The undersigned counsel to the above-captioned debtors and debtors-in-possession (the “**Debtors**”) hereby certifies as follows:

1. October 30, 2023, the Debtors filed their (i) *Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [D.I. 635] (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the “Plan”); and (ii) *the Disclosure Statement Pursuant to 11 U.S.C. § 1125 with Respect to Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [D.I. 637] (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the “Disclosure Statement”).

2. November 1, 2023, the Court entered an order approving the Disclosure Statement and established certain solicitation and voting procedures with respect to the Plan [D.I. 651] (the “Voting Procedures Order”).

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

3. On November 10, 2023, the Debtors filed the *Debtors' First Omnibus (Non-Substantive) Objection to Certain (i) Duplicate Claims, (ii) Insufficient Documentation Claims, (iii) Incorrect Debtor Claims, and (iv) Late-Filed Claims* [D.I. 687] (the “Claim Objection”), whereby the Debtors objected to the claim filed by Fiberdyne Research Pty Ltd (the “Fiberdyne”).

4. Solely for the purpose of allowing the Claimant to vote on the Plan, the Debtors and Fiberdyne entered into the *Stipulation Between Debtors and Fiberdyne Research Pty Ltd Regarding Temporary Allowance of Claims Solely for Purposes of Voting on Debtors' Joint Chapter 11 Plan* (the “Stipulation”). Attached hereto as Exhibit A is a proposed order (the “Proposed Order”) approving the Stipulation. A copy of the Stipulation is attached to the Proposed Order as Exhibit 1.

WHEREFORE, the Debtors respectfully requests that the Court enter the Proposed Order approving the Stipulation at the Court’s earliest convenience.

Dated: December 14, 2023
Wilmington, Delaware

<p><u>/s/ Morgan L. Patterson</u></p> <p>WOMBLE BOND DICKINSON (US) LLP Donald J. Detweiler (DE Bar No. 3087) Morgan L. Patterson (DE Bar No. 5388) 1313 North Market Street, Suite 1200 Wilmington, Delaware 19801 Telephone: (302) 252-4320 Facsimile: (302) 252-4330 don.detweiler@wbd-us.com morgan.patterson@wbd-us.com</p> <p><i>Counsel to the Debtors and Debtors in Possession</i></p>	<p>WHITE & CASE LLP Thomas E Lauria (admitted <i>pro hac vice</i>) Matthew C. Brown (admitted <i>pro hac vice</i>) Fan B. He (admitted <i>pro hac vice</i>) 200 South Biscayne Boulevard, Suite 4900 Miami, FL 33131 Telephone: (305) 371-2700 tlauria@whitecase.com mbrown@whitecase.com fhe@whitecase.com</p> <p>David M. Turetsky (admitted <i>pro hac vice</i>) 1221 Avenue of the Americas New York, NY 10020 Telephone: (212) 819-8200 david.turetsky@whitecase.com</p> <p>Jason N. Zakia (admitted <i>pro hac vice</i>)</p>
---	---

111 South Wacker Drive, Suite 5100
Chicago, IL 60606
Telephone: (312) 881-5400
jzakia@whitecase.com

Roberto Kampfner (admitted *pro hac vice*)
Doah Kim (admitted *pro hac vice*)
RJ Szuba (admitted *pro hac vice*)
555 South Flower Street, Suite 2700
Los Angeles, CA 90071
Telephone: (213) 620-7700
rkampfner@whitecase.com
doah.kim@whitecase.com
rj.szuba@whitecase.com

*Counsel to Debtors and
Debtors in Possession*